

**IN UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

UMAR BURLEY, et. al,

*

Plaintiff, *

v.

*** Civil No.: 1:18-cv-01743-ELH**

**BALTIMORE CITY
POLICE DEPARTMENT, et al.,**

*

Defendants. *

* * * * * * * * * * *

**DEFENDANTS' BALTIMORE POLICE DEPARTMENT AND DEAN PALMERE'S
CONSENT MOTION TO EXTEND TIME TO FILE RESPONSES TO PLAINTIFFS'
SECOND AMENDED COMPLAINT**

Defendants Baltimore Police Department ("BPD") and Dean Palmere ("Palmere") by their undersigned counsel, respectfully file this Consent Motion to Extend Time to File their Responses to Plaintiffs' Second Amended Complaint (ECF No. 23) and in support thereof state as follows:

1. On November 28, 2018, this Court granted Plaintiffs' request to file a Second Amended Complaint by December 21, 2018, Defendants' response being due on January 25, 2019. ECF Nos. 21, 22.
2. On or about December 21, 2018, Plaintiffs' filed their Second Amended Complaint, which included new defendants and a new count for indemnification against the Officer Defendants and the BPD. ECF No. 23; ¶¶ 339-342 (Count XII).
3. Defendants via this consent motion request a brief seven (7) day extension of time to file their responses, via pleading or motion, to the Second Amended Complaint

thereby extending the time within which their responses are due from January 25, 2019 to February 1, 2019.

4. Plaintiffs' counsel has consented to the Seven (7) day extension requested herein.
5. This motion is not made for any improper purpose or delay.

WHEREFORE, Defendants BPD and Palmere, with consent of Plaintiffs, respectfully request an extension of time of nine (7) days to file their responses to Plaintiff's Second Amended Complaint, up to and including Friday, February 1, 2019. A proposed Order is attached.

Respectfully submitted,

/s/

Kara K. Lynch (29351)
Chief Solicitor
Baltimore City Department of Law
Office of Legal Affairs
City Hall, Room 101
100 N. Holliday Street
Baltimore, MD 21202
410-396-2496 (telephone)
410-396-2126 (facsimile)
Attorney for Defendants BPD and Palmere

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 18th day of January, 2019, a copy of the foregoing Consent Motion for Extension of Time was filed with the United States District Court for the District of Maryland by electronic filing. All counsel of record being served via the Court's electronic filing system.

/S/
Kara K. Lynch (No. 29351)